

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division.

Anthony J. Alfieri-Crispin)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:15cv608-AJT/MSN
)	
Li Ting)	
)	
Defendant)	

In Re: x3.com

Plaintiff's Motion for Entry of Default Judgment

Comes Now the Plaintiff, Anthony J. Alfieri-Crispin (hereinafter Alfieri-Crispin), by counsel, and files this motion for default judgment pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, seeking judgment by default against the Defendant subject internet domain names listed on Exhibit A attached hereto and in support thereof states as follows:

The Complaint in this matter was filed on May 28, 2015. On June 19, 2015 this Court entered an Order directing publication of notice pursuant to the Anti-Cybersquatting Protection Act, 15 U.S.C. 1125(d)(2)(A)ii)(II)(bb). On July 9, 2015 proof of publication was filed with this Court as document 15.

On July 22, 2015 default was entered by the Clerk of this Court. Because the defendant domains are now in default, the well-plead allegations of the Complaint should be taken as true.

Wherefore, Plaintiff Alfieri-Crispin submits that he is entitled to the *in rem* relief prayed for in the complaint and requests that this Court enter judgment in his favor as to the subject domain name and that said domain name be transferred to the Plaintiff, either through the auspices of the appropriate domain name registrar or through modification of the zone record controlled by the appropriate registry.

The Plaintiff further requests that the ultimate judgment order include language to the following effect:

It is hereby Ordered, as further relief in this matter that the Registry of Record, being Verisign, Affiliax, or some other Registry, shall promptly change the registrar for the domain name <X3.com> as directed by Plaintiff's Counsel; and it is further

Ordered that the registrar of the domains name <X3.com> shall place the referenced domain name in the account as directed by the Plaintiff's Counsel.

The Plaintiff further requests that the remaining claims asserted in the complaint be dismissed without prejudice.

Date: July 22, 2015

Respectfully Submitted,
Anthony Alfieri-Crispin
By Counsel

/s

Jonathan Westreich, Esq.
VSB No. 37393
Greenberg & Lieberman (of counsel)
604 Cameron Street
Alexandria, Virginia 22314
703-299-9050
fax: 703-548-1831
jonathan@westreichlaw.com

and

Jason Schaeffer, Esq.
ESQwire.com, P.C.
1908 Route 70 East
Cherry Hill, NJ 08003
jason@ESQwire.com
856-874-9651/ Fax: 856-874-9182

and

Stevan Lieberman, Esq.
Admitted *pro hac vice*
Greenberg & Lieberman
1425 K Street NW, Suite 350
Washington, DC 20005
202-625-7000

Counsel to the Plaintiff